

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
WINSTON-SALEM DIVISION**

FEDERAL TRADE COMMISSION,  
STATE OF CALIFORNIA, STATE OF  
COLORADO, STATE OF ILLINOIS,  
STATE OF INDIANA, STATE OF IOWA,  
STATE OF MINNESOTA, STATE OF  
NEBRASKA, STATE OF OREGON,  
STATE OF TENNESSEE, STATE OF  
TEXAS, STATE OF WASHINGTON, and  
STATE OF WISCONSIN,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG,  
SYNGENTA CORPORATION,  
SYNGENTA CROP PROTECTION, LLC,  
and CORTEVA, INC.,

Defendants.

Case No. 1:22-cv-00828-TDS-JEP

**JOINT CONSENT MOTION FOR  
ENTRY OF PROTECTIVE ORDER**

Plaintiffs Federal Trade Commission and the states of California, Colorado, Illinois, Indiana, Iowa, Minnesota, Nebraska, Oregon, Tennessee, Texas, Washington, and Wisconsin, acting by and through their respective Attorneys General (“Plaintiffs”); and Defendants Syngenta Crop Protection AG, Syngenta Corporation, Syngenta Crop Protection, LLC (collectively, “Syngenta”) and Corteva, Inc. (together with Plaintiffs and Syngenta, the “Parties”) hereby jointly move the court to enter the attached Proposed Protective Order.

Dated: April 30, 2024

Respectfully submitted,

/s/ Allyson M. Maltas  
ALLYSON M. MALTAS  
Senior Trial Counsel  
Federal Trade Commission  
Bureau of Competition  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
Telephone: (202) 326-3646  
Email: amaltas@ftc.gov

KARNA ADAM  
JOSEPH R. BAKER  
WESLEY G. CARSON  
ROBERT Y. CHEN  
ELIZABETH A. GILLEN  
PHILIP J. KEHL  
MICHAEL J. TURNER  
JAMES H. WEINGARTEN

*Attorneys for Plaintiff Federal Trade Commission*

s/ Nicole S. Gordon  
NICOLE S. GORDON  
Deputy Attorney General  
Office of the California Attorney General  
455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94610  
Telephone: (415) 510-4400  
Email: nicole.gordon@doj.ca.gov

*Attorney for Plaintiff State of California*

/s/ Conor J. May  
JAN M. ZAVISLAN  
Senior Counsel  
CONOR J. MAY  
Assistant Attorney General  
Colorado Department of Law  
Office of the Attorney General  
Ralph L. Carr Judicial Center  
1300 Broadway, 7th Floor  
Denver, CO 80203  
Telephone: (720) 508-6000  
Email: Jan.Zavislan@coag.gov  
Conor.May@coag.gov

*Attorneys for Plaintiff State of Colorado*

/s/ Paul J. Harper

PAUL J. HARPER

Assistant Attorney General, Antitrust  
Office of the Illinois Attorney General  
115 S. LaSalle Street  
Chicago, IL 60603  
Telephone: (312) 814-3000  
Email: paul.harper@ilag.gov

*Attorney for Plaintiff State of Illinois*

/s/ Matthew Michaloski

MATTHEW MICHALOSKI

CHRISTI FOUST

Deputy Attorneys General  
SCOTT BARNHART  
Chief Counsel and Director of Consumer  
Protection  
Office of the Indiana Attorney General  
Indiana Government Center South – 5th Fl.  
302 W. Washington Street  
Indianapolis, IN 46204-2770  
Telephone: (317) 234-1479  
Email: matthew.michaloski@atg.in.gov  
christi.foust@atg.in.gov  
scott.barnhart@atg.in.gov

*Attorneys for Plaintiff State of Indiana*

/s/ Noah Goerlitz

NOAH GOERLITZ

Assistant Attorney General  
Office of the Iowa Attorney General  
1305 E. Walnut St.  
Des Moines, IA 50319  
Telephone: (515) 725-1018  
Email: noah.goerlitz@ag.iowa.gov

*Attorney for Plaintiff State of Iowa*

/s/ Katherine Moerke

KATHERINE MOERKE

JASON PLEGGENKUHLE

ELIZABETH ODETTE

Assistant Attorneys General  
Office of the Minnesota Attorney General  
445 Minnesota Street, Suite 1200  
St. Paul, MN 55101-2130  
Telephone: (651) 296-3353  
Email: katherine.moerke@ag.state.mn.us  
jason.pleggenkuhle@ag.state.mn.us  
elizabeth.odette@ag.state.mn.us

*Attorneys for Plaintiff State of Minnesota*

/s/ Colin P. Snider

COLIN P. SNIDER

Office of the Attorney General of  
Nebraska

2115 State Capitol Building  
Lincoln, NE 68509

Telephone: (402) 471-3840

Email: Colin.Snider@nebraska.gov

*Attorneys for Plaintiff State of Nebraska*

/s/ Hamilton Millwee

HAMILTON MILLWEE

Assistant Attorney General

TATE BALL

Assistant Attorney General

Office of the Attorney General of  
Tennessee

P.O. Box 20207

Nashville, TN 37202

Telephone: (615) 291-5922

Email: Hamilton.Millwee@ag.tn.gov

Tate.Ball@ag.tn.gov

*Attorneys for Plaintiff State of Tennessee*

/s/ Luminita Nodit

LUMINITA NODIT

Assistant Attorney General,  
Antitrust Division

Washington State Office  
of the Attorney General

800 Fifth Ave., Suite 2000

Seattle, WA 98104

Telephone: (206) 254-0568

Email: Lumi.Nodit@atg.wa.gov

*Attorney for Plaintiff State  
of Washington*

/s/ Timothy D. Smith

TIMOTHY D. SMITH

Senior Assistant Attorney General  
Antitrust and False Claims Unit

Oregon Department of Justice  
100 SW Market St

Portland, OR 97201

Telephone: (503) 934-4400

Email: tim.smith@doj.state.or.us

*Attorney for Plaintiff State of Oregon*

/s/ William Shieber

JAMES LLOYD

Chief, Antitrust Division

TREVOR YOUNG

Deputy Chief, Antitrust Division

WILLIAM SHIEBER

Assistant Attorney General

Office of the Attorney General of Texas

300 West 15th Street

Austin, TX 78701

Telephone: (512) 936-1674

Email: William.Shieber@oag.texas.gov

*Attorneys for Plaintiff State of Texas*

/s/ Laura E. McFarlane

LAURA E. MCFARLANE

Assistant Attorney General

Wisconsin Department of Justice

Post Office Box 7857

Madison, WI 53707-7857

Telephone: (608) 266-8911

Email: mcfarlanele@doj.state.wi.us

*Attorney for Plaintiff State of Wisconsin*

*/s/ Patrick M. Kane*

---

Patrick M. Kane  
N.C. Bar No. 36861  
pkane@foxrothschild.com  
FOX ROTHSCHILD LLP  
230 N. Elm Street, Suite 1200  
PO Box 21927 (27420)  
Greensboro, NC 27401  
Telephone: 336.378.5200  
Facsimile: 336.378.5400

Paul S. Mishkin\*  
paul.mishkin@davispolk.com  
David B. Toscano\*  
david.toscano@davispolk.com  
DAVIS POLK & WARDWELL LLP  
450 Lexington Avenue  
New York, NY 10017  
Telephone: (212) 450-4292  
Facsimile: (212) 701-5292

\*Specially appearing under L.R. 83.1(d)

*Attorneys for Defendants Syngenta Crop  
Protection AG, Syngenta Corporation, and  
Syngenta Crop Protection, LLC*

*/s/ Mark E. Anderson*

---

Mark E. Anderson  
N.C. Bar No. 15764  
manderson@mcguirewoods.com  
MCGUIREWOODS LLP  
501 Fayetteville Street, Suite 500  
Raleigh, NC 27601  
Telephone: 919.755.6600  
Facsimile: 919.755.6699

David R. Marriott\*\*  
dmarriott@cravath.com  
Margaret T. Segall\*\*  
msegall@cravath.com  
CRAVATH, SWAINE & MOORE LLP  
825 Eighth Avenue  
New York, NY 10019  
Telephone: (212) 474-1000  
Facsimile: (212) 474-3700

\*\* Specially appearing under L.R. 83.1(d)

*Attorneys for Defendant Corteva, Inc.*